**EXHIBIT "B"** 

## Case 1:04-cv-01350-GMS Document 32-3 Filed 10/05/2005 Page 2 of 7 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS, PLAINTIFF,

V.

CW. A. NO. 04 - 1350 (GMS)

DR. SYLVIA FOSTER, STAFF
MEMBERS, THE DELAWARE
PSYCHIATRIC CENTER AND
MR. GREY,
DEFENDANTS.

ADDITIONAL POINTS TO SUPPORT MOTION REQUESTING PERMISSION TO AMEND COMPLAINT

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO SE, AND REQUEST THIS HONORABLE COURT TO CONSIDER AND GRANT THE PLAINTIFF'S ADDITIONAL POINTS TO SUPPORT MOTION REQUESTING PERMISSION TO AMED COMPLAINT, IN ORDER TO CURE DEFICIENCIES.

IN SUPPORT THEREOF, THE PLAINTIFF HEREBY ASSERTS THE FOLLOWING:

- HEAD NURSE CURTIS CORNISH, LANCE SAPERS,.

  C. OATS, ROSE ARES, DR. OVREISHI TANYA WILSON, DONNA LAWRENCE, PAT RILEY, T. CONVERS

  UNIT DIRECTOR DIANNE STACHOWSKI, MARGRETWILSON,
  SHORT BALD HEADED AFRICAN AMERICAN MR. JOHNSON.

  NOTE: MR. JOHNSON, LANCE SAPERS AND DAVE MOTETT

  ARE THE THREE MEN WHO WERE INVOLVED WITH THE
  INCIDENT WITH MR R. GRAY.
- 2.) TO INCLUDE SPECIFIC DETAILS IN REGARD TO

  DR. SYLVIA FOSTER AND OR CITED DEFENDANTS

  ("NEVER") GIVING ME ANY SORT OF HEARING BEFORE

  VIOLATING MY CIVIL RIGHTS, MY 1 ST, 4TH 5TH 6TH

  STH & 14 U.S.C AMENDMENTS & DELAWARE STATUTES &

  OR LAWS OF THE UNITED STATES.
- 3.) TO INCLUDE VALID FACTUAL DOCUMENTATION TO SUPPORT THE FACT THAT DR. FOSTER, HELEN HANLON, DISTRICT ATTORNEY BRIAN J. ROBERTSON, LANCE SAPERS, GLORIA BANKS, C. OATS, DAVE MOTFITT, R. GRAY, MR. JOHNSON, SEGAL, J., DIANNE STACHOWSKI, ICAREN CHAMBERLIN, TANYA WILSON, KATHYRN-SHENAMAN, CURTIS CORNISH ALL CONSIPERED TO VIOLATE MY CIVIL RIGHTS 1ST, 4TH, 5TH, 6TH, 8TH, \$14TH U.S.C.A.

- 4.) TO INCLUDE DETAILED STATEMENTS AND FACTUAL DOCUMENTATION OF ATYPICAL AND SIGNIFICANT.
  HARDSHIPS.
- 5.) TO INCLUDE REQUEST FOR LIENS ON THE DEFENDANTS ASSETS.
- (e.) TO INCCUDE SPECIFIC DETAILS OF HOW EACH DEFENDANT VIOLATED MY CIVIL RIGHT, AS WELL AS TO SPECIFY EXACTLY WHAT RIGHT(S) THEY VIOLATED COLLECTIVELY OR INDIVIDUALLY, UNDER THE COLOR OF LAW.
- 7.) TO INCLUDE MADE CIVIL COVER SHEET JS44.
- 8.) TO INCLUDE A REQUEST FOR PRECIMINARY
  INJUNCTION, DUE TO THE GROSSLY ERRONEOUS
  PSYCHIATRIC EVALUATION AUTHORED AND SUBMITTED
  TO THE SUPERIOR COURT OF DELAWARE BY
  DR. SYLVIA FOSTER CAUSING ME TO ENDURE A
  PROLONGED DURATION OR INCARCERATION AND OR
  INCARCERATION PERIOD.

FOR THE FOREGOING REASONS, THE PLAINTIFF,

JIMMIE LEWIS, PRO-SE, ASKS THIS HONORABLE

COURT TO CONSIDER AND GRANT THE PLAINTIFF'S

ADDITIONAL POINTS TO SUPPORT MOTION REDIMESTING

PERMISSION TO AMEND COMPLAINT IN ALL ASPECTS

STATED HEREIN.

DATED: 7/19/05

RESPECTFULLY SUBMITHED

Jimne Levis

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS, PLAINTIFF,

V.

CIU, A.NO. 04-1350 (BMS)

DR. SYLVIA FOSTER, STAFF MEMBERS, THE DELAWARE PSYCHIATRIC CENTER AND MR. GREY, DEFENDANTS.

012DER

AND NOW, TO WIT, THIS \_\_\_\_\_ DAY OF \_\_\_\_\_\_
HAVING CONSIDERED THE PLAINTIFF'S ADDITTIONAL POINTS TO
SUPPORT MOTION REQUESTING PERMISSION TO AMEND
COMPLAINT:

IT IS HEREBY OF DERED THAT THE PLAINTIFF'S ADDITIONAL POINTS TO SUPPORT MOTION REQUESTING PERMISSION TO AMEND COMPLAINT HAS BEEN GRANTED.

BY THE COURT:

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THE HONORABLE	GREGORY	M. SLEET

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

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eIV. A. No. 04-1350 (GMS)

DR. SYLVIA FOSTER, STAFF MEMBERS, THE DELAWARE PSYCHIATRIC CENTER, AND MR. GREY, DEFENDANTS.

## CERTIFICATE OF SERVICE

I, THE UNDERSIGNED, DO HEREBY CERTIFY ON THIS 19TH DAY OF TULY, 2005, THAT TWO TRUE AND CORRECT COPIES OF PLAINTIFF'S

TIMMIE LEWIS' ADDITIONAL POINTS TO SUPPORT MOTION REQUESTING
PETEMISSION TO AMEND COMPLAINT HAVE BEEN SERVED BY

U.S MAIL TO THE FOLLOWING:

CYUTHIA G. BEAN ESQ.

DELAWARE STATE BAR I.D NO 2565

1001-TEFFERSON PLAZA, SUITE 202

WILMINGTON, DE 19801

ATTORNEY FOR DEFENDANT DR. SYLVIA FOSTER.

DATED: TULY 19, 2005

JIMMIL JEINES SBI# 506622 DEL.CORR.CENTER 1181 PADDOCK ED. 5MYENA, DE 19977